

September 2, 2020

VIA ECF & EMAIL

Hon. Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Sq., Room 2204
New York, NY 10007

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, 18-CV-1781 (PGG)
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692 (PGG)

Dear Judge Gardephe:

We represent Plaintiffs in the above-referenced actions, and write pursuant to Rule II.A of Your Honor's Individual Rules of Practice for Civil Cases. The Transworld Defendants ("TSI") recently filed objections to Magistrate Judge Moses's denial of TSI's motion to quash the deposition subpoena of one of its employees ("Affiant X"). (Dkt. No. 201 in Case No. 18-cv-1781; Dkt. No. 138 in Case No. 18-cv-7692).

TSI filed its objections under seal, after publicly filing a letter to Your Honor asserting that Affiant X's identity, and the nature of the purported medical condition it says requires preclusion of this individual's deposition, must be kept confidential. (Dkt. No. 200 in Case No. 18-cv-1781; Dkt. No. 137 in Case No. 18-cv-7692).

Plaintiffs oppose TSI's objections and urge this Court to overrule them. While Plaintiffs dispute that Affiant X's purported condition exists as TSI describes it, we are filing our responses to TSI's objections under seal in light of TSI's confidentiality assertion. The sealed filing will appear on ECF shortly. We will provide counsel of record an unsealed copy of our responses.

Respectfully submitted,

/s/ Gregory A. Frank

cc: All Counsel of Record (via ECF)